# **EXHIBIT 1 TO ORDER**

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

ART VAN FURNITURE, LLC, et al.,1

Debtors.

ALFRED T. GIULIANO, in his capacity as Chapter 7 Trustee of Art Van Furniture, LLC, *et al.*,

Plaintiff,

VS.

FRANKLIN CORP.

Defendants.

Chapter 7

Case No. 20-10553 (CSS)

(Jointly Administered)

Adv. Proc. No. 22-50159 (CSS)

# STIPULATION FOR FINAL EXTENSION OF TIME FOR DEFENDANT TO ANSWER THE COMPLAINT

Plaintiff, Alfred T. Giuliano in his capacity as chapter 7 trustee of Art Van

Furniture, LLC, et al., (the "Plaintiff"), for the estates of the above-captioned debtors (the

"Debtors") in the above-captioned cases pending under chapter 7 of title 11 of the United States

Code (the "Bankruptcy Code"), by and through his undersigned counsel and defendant Franklin

Corp.( the "Defendant," and together with Plaintiff, the "Parties"), enter into this Stipulation for

Final Extension of Time for Defendants to Answer the Complaint (the "Stipulation") and hereby stipulate and agree as follows:

1. The Parties agree and stipulate that the time within which the Defendant may file

<sup>&</sup>lt;sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Art Van Furniture, LLC (9205); AVF Holding Company, Inc. (0291); AVCE, LLC (2509); AVF Holdings I, LLC (2537); AVF Holdings II, LLC (7472); AVF Parent, LLC (3451); Levin Parent, LLC (8052); Art Van Furniture of. Canada, LLC (9491); AV Pure Sleep Franchising, LLC (8968); AVF Franchising, LLC (6325); LF Trucking, Inc. (1484); Sam Levin, Inc. (5198); and Comfort Mattress LLC (4463).

an answer the *Complaint* [D.I. 1] in the above-captioned adversary proceeding is hereby extended to and including November 2, 2022.

2. Except as specifically set forth herein, the Parties reserve all of their respective rights in this matter.

Dated: October 3, 2022

Dated: October 3, 2022

PACHULSKI STANG ZIEHL & JONES LLP

BAYARD, P.A.

### /s/ Peter J. Keane

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and

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